

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN**

JEANNA NORRIS, KRAIG EHM,)	
and D'ANN ROHRER,)	
)	
Plaintiffs,)	Case No. 1:21-cv-00756
)	
vs.)	
)	
SAMUEL L. STANLEY, JR.,)	
in his official capacity as President of)	
Michigan State University; DIANNE)	
BYRUM, In her official capacity as Chair)	
of the Board of Trustees, DAN KELLY,)	
in his official capacity as Vice Chair)	
of the Board of Trustees; and RENEE)	
JEFFERSON, PAT O'KEEFE,)	
BRIANNA T. SCOTT, KELLY TEBAY,)	
and REMA VASSAR in their official)	
capacities as Members of the Board of)	
Trustees of Michigan State University,)	
and JOHN and JANE DOES 1-10,)	
)	
Defendants.)	

DEFENDANTS' MOTION TO DISMISS AMENDED COMPLAINT

Plaintiffs' claims against the Michigan State University defendants (collectively, "MSU") for alleged violations of their substantive and procedural due process rights and the Supremacy Clause fail as a matter of law. Moreover, Plaintiffs can allege no set of facts that would sufficiently state these claims against MSU, even if given another opportunity to do so.

WHEREFORE, for the reasons set forth in the brief MSU is contemporaneously filing with this motion, MSU respectfully requests that the Court dismiss Plaintiffs' Amended Complaint with prejudice.

Date: November 19, 2021

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CERTIFICATE OF SERVICE

I hereby certify that on November 19, 2021, a copy of the foregoing was filed electronically. Service of this filing will be made on all ECF-registered counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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